

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MOHAMED MONASAR, GABRIELLE WALLS,  
GABRIEL ABREU, JESUS HERNANDEZ  
TORRES, LUIS MARTINEZ, BRANDON  
ROMAN, and OSAMA ALI, on behalf of themselves and  
others similarly situated,

**NOTICE OF REMOVAL**

Case No. 25- Civ. 1337

Plaintiffs,

-against-

THE CITY OF NEW YORK, TARGET  
CORPORATION, THE NEW YORK TIMES  
COMPANY, BURLINGTON COAT FACTORY  
WAREHOUSE CORP., Bj's WHOLESALE CLUB  
INC., SAM ASH MUSIC CORPORATION, THE  
TJX COMPANIES, LLC D/B/A MARSHALLS,  
180 MAIDEN LANE, LLC , SHOP-RITE  
SUPERMARKETS, INC., and BARCLAYS BANK  
PLC AKA BARCLAYS BANK DELAWARE and  
BNOS BAIS YAAKOV OF FAR ROCKAWAY,

Defendants.

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**TO: THE UNITED STATES DISTRICT COURT,  
SOUTHERN DISTRICT OF NEW YORK**

Defendant, City of New York, by and through its attorney Muriel Goode-Trufant,  
Corporation Counsel of the City of New York, respectfully move this Court as follows:

1. On January 17, 2025, City of New York received by email service, on the  
Office of the Corporation Counsel, a Summons and Complaint filed in the Supreme Court of the  
State of New York, County of New York, under Index No. 150717/2025. See Exhibit "A"

2. On January 21, 2025, Plaintiff filed an Amended Complaint naming the  
City of New York, Target Corporation, The New York Times, Burlington Coat Factory  
Warehouse Corp., BJ's Wholesale Club, Inc., Sam Ash Music Corporations, The TJX  
Companies, LLC D/B/A Marshalls, 180 Maiden Lane, LLC, Shop-Rite Supermarkets, Inc., and

Barclays Bank PLC aka Barclays Bank Delaware and BNOS Bais Yaakov of Far Rockaway (collectively, “Defendants”), and setting forth the claims for relief upon which the action is based.

3. A copy of Plaintiffs’ Amended Summons and Complaint is annexed hereto as Exhibit “B.”

4. Plaintiffs bring this action alleging that Defendants failed to pay, or failed to timely pay, wages for work performed by the Plaintiffs in violation of the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq. (“FLSA”), the New York Labor Law, N.Y., Lab. Law §§ 1, et seq. (“NYLL”), and in the alternative the Freelance Isn’t Free Act, N.Y.C., Admin. Code §§ 20-927, et seq. (“FIFA”). See Exhibit “B.”

5. On January 31, 2025, Plaintiffs filed a Notice of Motion for Conditional Certification of Collective Action Against the NYPD and Target. See Exhibit “C.”

6. The above-captioned action is a civil action of which the District Court has original jurisdiction pursuant to 28 U.S.C. § 1331, in that it alleges claims which arise under the Constitution and laws of the United States. This action is therefore removable to the District Court without regard to the citizenship or residence of the parties, pursuant to 28 U.S.C. §§ 1441 and 1443.

7. This Notice of Removal is timely because it is being filed within thirty days of the City of New York’s receipt of the Summons and Complaint. See 28 U.S.C. § 1446(b).

8. All Defendants properly served and joined on the date of this Notice of Removal consent to removal pursuant to 28 U.S.C. § 1446. See Exhibit “D.”

9. Pursuant to 28 U.S.C. §1466(d), counsel for the City of New York shall promptly provide plaintiffs, through their counsel, with written notice of the filing of this Notice of Removal, and shall file a copy of this Notice of Removal with the Clerk of the Supreme Court of the State of New York, County of New York.

10. The City of New York reserves all claims and defenses, including, without limitation, those set forth in Rule 12(b) of the Federal Rules of Civil Procedure

11. The City of New York is unaware of any previous application for the relief requested herein.

**WHEREFORE**, the City of New York respectfully requests that the above-captioned action be removed from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York.

Dated: New York, New York  
February 14, 2025

Muriel Goode-Trufant  
Corporation Counsel  
of the City of New York  
Attorney for the City of New York  
100 Church Street, Room 2-124  
New York, New York 10007  
(212) 356-3580  
[earbizo@law.nyc.gov](mailto:earbizo@law.nyc.gov)

By:



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Eric Arbizo  
Assistant Corporation Counsel

TO: Law Office of John A. Scola, PLLC  
Attorneys for Plaintiffs and the Putative Class and  
Collective  
John Scola  
90 Broad Street Suite 1023  
New York, New York 10004  
(917) 423-1445  
[jscola@johnscolalaw.com](mailto:jscola@johnscolalaw.com)

GODDARD LAW PLLC  
*Attorneys for Plaintiffs* and the Putative Class and  
Collective  
Megan S. Goddard, Esq.  
39 Broadway, Suite 1540  
New York, New York 10006  
(646) 964-1178  
[Megan@goddardlawnyc.com](mailto:Megan@goddardlawnyc.com)

Charny & Wheeler P.C.  
Attorneys for Plaintiffs and the Putative Class and  
Collective  
Nathaniel K. Charny, Esq.  
42 West Market Street  
Rhinebeck, New York 12572  
Tel - (845) 876-7500  
Fax - (845) 876-7501  
[ncharny@charnywheeler.com](mailto:ncharny@charnywheeler.com)